



OMAR T. MOHAMMEDI, ESQ.  
DIRECT DIAL: (212) 725-3846 x101  
EMAIL: [OMOHAMMEDI@OTMLAW.COM](mailto:OMOHAMMEDI@OTMLAW.COM)

ADMITTED: NEW YORK, EIGHTH CIRCUIT  
SECOND CIRCUIT, ALGERIAN BAR  
US COURT ON INTERNATIONAL TRADE

February 8, 2019

**VIA ECF**

The Honorable Sarah Netburn  
United States Magistrate Judge  
Thurgood Marshall  
United States Courthouse  
40 Foley Square  
New York, NY 10007

**Re: In re Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)**

Dear Judge Netburn:

On behalf of Defendants World Assembly of Muslim Youth Saudi Arabia and World Assembly of Muslim Youth International (collectively referred to as “WAMY”), we write to provide the Court with a status update on WAMY’s search for and production of branch office bank records, per Your Honor’s Order of January 15, 2019 (DKT # 4350).

As the Court has Ordered, the Plaintiffs’ Executive Committee (“PEC”) was to produce a list of ten (10) regional offices that the PEC believes have provided inadequate documentation regarding their banking records, within seven (7) days of Your Honor’s Order (January 22, 2019). However, PEC did not provide this list until Friday, January 25, 2019.

Upon receiving this list, WAMY immediately began reviewing all of its prior productions from 2012 to 2018 for bank records from these ten branch offices, which were voluminous. This has been an exhaustive effort because comprehensive productions of banking records from many if not all of these branch offices were already made. Additionally, WAMY has been working tirelessly to search anew for the relevant bank records at branch offices. All records related to numerous bank accounts are also being systematically searched for. As a result, this process has been meticulous and painstaking.

Given the delay in receiving the list from PEC and the number of documents to be re-reviewed, it is apparent that WAMY will not be able to finish the search by March 1, 2019. Counsel has had multiple communications with our client about this search and production. WAMY is diligently working on the production including searching at the chapter and headquarters level. Counsel also will be travelling to Saudi Arabia to directly oversee the progress of the production. WAMY therefore respectfully requests that this Court Order a thirty (30) day extension of the 45-day deadline to produce bank records (and a declaration) as originally set forth in the Order, to April 1, 2019.

LAW FIRM OF  
**OMAR T. MOHAMMEDI, LLC**

---

Respectfully Submitted,

/s/ Omar Mohammedi

Omar Mohammedi, Esq.

/s/Fredrick Goetz

Frederick Goetz, Esq.

cc: All MDL Counsel of Record (via ECF)